

Exhibit C

From: [Recce, Susan](#)
To: ["joshua.campbell@sol.doi.gov"](mailto:joshua.campbell@sol.doi.gov)
Subject: Comments on SDNM recreational shooting plan
Date: Friday, November 17, 2017 10:29:13 AM
Attachments: [Comments on SDNM recreational shooting plan.docx](#)

Josh,

See exchange of emails. When I talked to Ben about this last month, I had the feeling that the Secretary's office was not going to pursue the concerns that the NRA and other NGOs raised in our comments (attached). We proposed modifying BLM's preferred planning alternative (Alternative C). BLM was under court order to get this shooting plan done by a certain date and, not surprising to me, the agency ran up to the deadline (supposedly the judge would not extend the timeframe) giving the Secretary's office no time to evaluate BLM's decision against the comments we submitted.

Susan

From: Recce, Susan
Sent: Thursday, October 05, 2017 5:51 PM
To: 'benjamin_cassidy@ios.doi.gov' <benjamin_cassidy@ios.doi.gov>
Subject: FW: Comments on SDNM recreational shooting plan

Hi Ben,

I am so happy for you. I think you will find the experience very rewarding. Will Tim Williams be reporting to you? A longtime friend of mine Jim Cason is an assistant Deputy Secretary and when you see him, please give him my regards.

Attached is the comment letter I sent in February. You will see in paragraph 2 that we want a modified Alternative C. Let me know if you have any questions on that. Also below is the BLM staffer we asked for those comments last month.

Best to you!!

Susan

From: Recce, Susan
Sent: Thursday, September 07, 2017 10:52 AM
To: 'cyounger@blm.gov' <cyounger@blm.gov>
Subject: Comments on SDNM recreational shooting plan

Hi Calle,

Attached are the comments the NRA and other NGOs that participate on the Federal Lands Hunting and Shooting Sports Roundtable sent to the BLM last February. As you may know, the Roundtable

was created by a MOU signed by 42 national hunting, fishing, wildlife conservation and shooting sports organizations and the BLM, USFS, USFWS, USACE, with the NPS as ad hoc. The fishing interests do not participate on the Roundtable as they chose to work with the MOU Federal partners in a different forum.

Let me know if you have any questions.

Susan Recce
Director
Conservation, Wildlife and Natural Resources
Institute for Legislative Action
National Rifle Association

Comments on SDNM Draft Target Shooting Plan

February 14, 2017

Wayne Monger, Project Manager
Lower Sonoran Field Office
Bureau of Land Management
21605 North 7th Avenue
Phoenix, AZ 85027

Dear Mr. Monger:

The undersigned organizations appreciate the opportunity to submit comments on the Draft Target Shooting Plan for the Sonoran Desert National Monument (Draft Plan). We have a long-standing and vested interest in access and opportunities on the Sonoran Desert National Monument (SDNM) for recreational shooting as evidenced by comments that several of our organizations have submitted in the past on various phases of the Monument planning process related to the future of recreational shooting in the Monument.

We support Alternative C, the BLM's preferred alternative, but strongly recommend that it be modified as explained further below. The Draft Plan offers five alternative planning scenarios and our comments are in order of the alternatives presented.

Alternative A would continue the 1988 Lower Gila South Resource Management Plan without change. It is an attractive option for shooting enthusiasts because it would allow recreational shooting to take place throughout the SDNM. However, our organizations, along with many sportsmen and women who recreate on public lands within the SDNM, recognize that there are areas within the Monument that must be closed to shooting in order for BLM to fulfill the mandates of monument designation, to balance other recreational activities, and to ensure that shooting takes place in safe venues for shooters and other visitors of the SDNM. We, therefore, oppose Alternative A.

Alternative B reflects the court order closure of 10,599 acres as a temporary measure until the Draft Plan is completed. Although the closure was based on BLM's recommendation, we believe it was ill conceived in that the area is the most popular and accessible area of the SDNM for recreational shooting and it does not contain the important values for which the SDNM was designated. Further, it fails to recognize the importance and potential use of the Juan Bautista de Anza National Historical Trail (NHT). Thus, we oppose adoption of Alternative B.

Alternative C would allow recreational shooting in the Desert Back Country Recreation Management Zone (RMZ) only and partially lift the court ordered closure as addressed in Alternative B. The effect is that 54,817 acres or 11% of the SDNM would be closed to recreational shooting. Our issue with Alternative C is that it includes lands within the NHT Recreation Management Zone (NHT RMZ) that lie alongside the El Paso Natural Gas Company pipeline road and Highway 238. This is where much of the accessible, popular and historic shooting sites are located. We question even why these lands were included in the NHT RMZ, let alone in the SDNM boundary.

Their inclusion seems to be based on the fact that the pipeline road is an identifiable and likely more practical boundary than one drawn across mountainous features or flat land. Irrespective of the reason, in drawing the boundary of the NHT RMZ, the BLM essentially created an arbitrary northwesterly boundary. This finger of land encompasses an area most used and most suitable for recreational shooting. The entire “finger” is outside of the NHT view shed and its lower end is approximately eight air miles from the NHT. Its southeasterly end is nearly five miles from the most northerly boundary of the HNT corridor; eight miles from the trail. The most northwesterly boundary is 12 miles from the NHT. This portion of the SDNM, as well as most of its northeasterly boundary (largely defined by the Pipeline Road), is atypical of the cultural and natural values for which the SDNM was created. There is no identifiable rationale for this area to be closed to shooting. The Draft Plan does not explain what values for which the SDNM was designated that these lands along the pipeline road hold that demand closure to continued use by recreational shooters.

With respect to the NHT itself, on page 3-69, the Draft Plan states that *“Certain segments of the NHT that traverse the planning area are considered to be among the best preserved corridor segments and most representative of the historic trail corridor conditions.”* Yet in other places in the Draft Plan, it says that there are no known physical remains or surviving trail signature in the SDNM (page 3-7). Thus, it makes no sense to close the most northwesterly boundary of the NHT RMZ to recreational shooting. The only effect of closing the lands within the NHT RMZ is to close accessible and traditional sites that have been used for decades by recreational shooters. Keeping those lands open would not compromise protection of the NHT given the distance of the shooting sites from the most northerly boundary of the NHT RMZ.

As a final note, the map on page 3-12 shows that there is desert tortoise habitat within the boundary we have described as arbitrary. From what we can assess, it appears that the tortoise habitat acreage that may be involved in this desirable recreational shooting areas is a fraction of a percent of the Category I habitat, and represents an infinitesimal amount of the total tortoise habitat in the SDNM.

Recommendation: That Alternative C be amended to open for recreational shooting that area described as the northwesterly finger of the NHT RMZ and that the amended Alternative C be adopted as the Target Shooting Plan for the SDNM.

Alternative D would close designated wilderness lands, lands managed to protect wilderness characteristics, and the RMZ. The closure is sweeping in nature resulting in 320,317 acres or 66% of the SDNM that would be closed to recreational shooting. There is nothing in the Wilderness Act or in the BLM Manual 6340 – Management of BLM Wilderness that prohibits recreational shooting from taking place in designated wilderness and lands managed to protect wilderness characteristics. Because recreational shooting generally takes place in areas accessible by roads, it is unlikely that this activity will have a measureable impact. In fact, in the section titled “Environmental Consequences - Analytical Assumptions”, page 4-2, the Draft Plan references the furthest shooters will travel for their activity (one hour) and their dependency on vehicular access to shooting areas. This underscores the fact that the majority of recreational shooting is site dependent and is relatively uncommon in wilderness areas where it has minimal impact.

Absent significant, definable impacts and an inability to mitigate those impacts, there is no justification to support Alternative D. Our comments regarding the RMZ are noted above in Alternative C. Therefore, we strongly oppose Alternative D.

Alternative E would close the entire SDNM to recreational shooting. The BLM has used monument designation in other areas of the state to close lands designated as national monuments to recreational shooting where this activity has been a historic use of those lands. Rather than allowing recreational shooting to continue at a few sites that had been traditionally used by shooters that had good access and provided, or could have provided with improvements, safe shooting experiences, the BLM chose to close those monuments entirely, and nearly did the same with the SDNM. We were very pleased that the BLM took the public comments received on the SDNM draft resource management plan (RMP) to reevaluate its intent to close the SDNM to recreational shooting.

However, swinging the pendulum in the complete opposite direction by leaving the SDNM entirely open to recreational shooting was not supported by our organizations who are participants with the BLM in the Federal Lands Hunting, Fishing and Shooting Sports Roundtable (Roundtable). As noted in our comments regarding Alternative A, we fully understand the balance that has to be made in any planning area for the management of diverse recreational pursuits, visitor safety, and protection of resources and facilities. Alternative E would again reverse course and support the direction of the original RMP and is not supported by the facts and analyses in the Draft Plan. We strongly oppose Alternative E.

There are other aspects of the Draft Plan that we would like to briefly comment on.

Appendix B Monitoring and Mitigation attempts to develop an impact identification protocol to determine the acreage of permissible cumulative impacts. It is our understanding that this protocol had not been tested prior to the development of the Draft Plan and its release. Because this is a new concept in our planning lexicon it is difficult to determine how this information could be used or abused and whether these measures are designed to affect the closure of lands open to recreational shooting.

As you may be aware, non-governmental participants on the Roundtable have worked over the years with the BLM in promoting stewardship of our public lands. We implemented, in partnership with Tread Lightly! the Respected Access is Open Access outdoor ethic education campaign. We fully support the objectives of the Education and Outreach section of Appendix B that seeks to expand the Respected Access campaign, and we fully support its component parts. Many of our organizations have and continue to support volunteer clean up events that the BLM sponsors and we look forward to working with the BLM in a partnership to keep important sites for recreational shooting in the SDNM open and accessible, and that all recreationists respect their public lands by exercising good judgment, behavior and stewardship.

Recommendation: That the Draft Plan include information about the Roundtable partnership and its efforts to assist BLM and its state partners and other stakeholders in keeping public lands open for traditional and long-standing recreational activities of hunting and shooting.

The Draft Plan states on page 2-19 in discussing “Alternatives Considered but Eliminated from Further Study” that the BLM rejected the opportunity to designate target shooting areas “because designated recreational target shooting areas are inconsistent with the Monument proclamation and conflict with current BLM policy.” A thorough review of the proclamation does not reveal any statement that specifically precludes the BLM from designating shooting areas. Rather, it is the BLM’s unwritten policy executed in recent years agency-wide that prohibits designating shooting areas on any public lands, monument designated or not, even if such designation or identification would assist in promoting safe

and responsible shooting and reducing user conflicts. In fact, we believe it fair to say that not designating such areas actually exacerbates conflict with other uses and poses a barrier to constructive working relationships that could result in proactive and positive management of recreational shooting to everyone's benefit.

Recommendation: That the BLM restate that the reason for not considering designating shooting areas as an alternative is because of BLM policy, not monument proclamation.

In the section on "Hazardous Materials and Public Safety; Recreational Target Shooting" pages 3-73, the Draft Plan notes that alkaline soil conditions typical of the SDNM generally prevent any subsurface migration of metals. This is consistent with EPA's statements about lead migration in its document entitled *Best Management Practices for Lead at Outdoor Shooting Ranges* (EPA-902-B-01-001). Reference is made to sampling soils at 15 shooting sites in the SDNM and the fact that lead and arsenic were found exceeding threshold levels in some samples. Without knowing the location of the 15 sites and where the thresholds were exceeded, we have no ability to assess the information relative to the purpose of the draft environmental impact statement (DEIS). We also do not know if benchmark samples were taken of nearby similar soils undisturbed by bullets.

Recommendation: That more explicit information is provided about the soil samples taken.

In closing, the undersigned support the BLM's preferred alternative, Alternative C, ONLY if it is amended to exclude the northwesterly section of the NHT RMZ that contains accessible and popular shooting sites that have existed for years. We believe that retaining these sites not only allows continued use of an already impacted area, and maintains the all-important access necessary to make recreational enjoyment of safe shooting attainable in the SDNM, and it will not impact the NHT, or any of the other objects and values for which the SDNM was created.

Thank you for the opportunity to comment.

Arizona Chapter of the Public Lands Foundation

Boone and Crockett Club

Congressional Sportsmen's Foundation

Council to Advance Hunting and the Shooting Sports

Mule Deer Foundation

National Rifle Association

National Shooting Sports Foundation

Safari Club International

Wildlife Management Institute

From: [Recce, Susan](#)
To: ["joshua.campbell@sol.doi.gov"](mailto:joshua.campbell@sol.doi.gov)
Subject: FW: Eastern Lake Mountain target shooting closure
Date: Friday, November 17, 2017 10:29:35 AM
Attachments: [Comments on Eastern Lake Mountains Target Shooting Plan Amendment.docx](#)

Hi Josh,

See exchange of emails below. What I wrote Ben summarizes the comments that NRA and several other NGOS collectively submitted to the BLM (see attached).

Susan

From: Recce, Susan
Sent: Friday, November 03, 2017 9:10 AM
To: 'Benjamin Cassidy' <benjamin_cassidy@ios.doi.gov>; Keane Larry <lkeane@nssf.org>; Rothwell Patrick <prothwell@nssf.org>; Crane Jeff <jeff@sportsmenslink.org>; Butler Mitch <mitchbutler@naturalresourceresults.com>; Williams Michael E. <Mike.Williams@btlaw.com>; Andy Treharne <Andy@sportsmenslink.org>
Subject: RE: East Lake closure (not eagle mountain)

Hi Ben,

Attached are the comments that NRA, CSF, NSSF and others collectively sent in 2016 to the BLM on its draft target shooting plan amendment, following comments the previous year during the scoping phase of the plan amendment.

The BLM's announcement of October 19, 2017 describes the agency's action correctly. This is a target shooting closure action, and not a target shooting "plan". You will see in our comments that we criticized the BLM for not developing a recreation area management plan that would have addressed the reality that target shooting was "increasing dramatically" (BLM's words) and the need to analyze the "carrying capacity" of the public lands in balance with other recreation and resource protection needs. This was not undertaken. As our letter of comments stated, "It appears the BLM's intent is not to manage shooting, but to take the easy route, which is incremental closures" of public lands to shooting.

BLM's announcement also states that "The rule simply establishes a rule of conduct for public recreational use of specific public lands in the Eastern Lake Mountains..." To the contrary, this is not a rule about conduct, it is a rule about land closure.

BLM's preferred alternative was to extend the existing 900-acre closure to an additional 2,557 acres of public land. The announcement says that a total of 2,004 acres will be closed, which is certainly less than the draft proposal of 3,450 acres. However, regardless of the reduction in the number of acres to be closed, the plan is a plan for closure, not a plan for target shooting management. As our comments explain, approaching issues associated with dispersed shooting in this manner sets the

stage for future closures.

BLM's announcement says that the shooting sports communities have expressed concerns about the potential loss of a popular target shooting area. Indeed this is the case. BLM follows that statement by saying that it did not receive any protests. By protests, it means that no one filed a formal protest. That is not surprising. Speaking from experience, It is a waste of time. The scales tip to the judgment of the agency on land management decisions unless some grievous error in following NEPA or other federal laws is discovered. Just because no protests were filed does not mean the agency's decision is sound, and that certainly applies to Eastern Lake Mountains.

I appreciate your reaching out to us,
Susan

From: Benjamin Cassidy [REDACTED]
Sent: Thursday, November 02, 2017 12:47 PM
To: Keane Larry [REDACTED]; Rothwell Patrick [REDACTED] >; Crane Jeff [REDACTED]; Recce, Susan [REDACTED]; Butler Mitch [REDACTED] >; Williams Michael E. [REDACTED] >
Subject: Fwd: East Lake closure (not eagle mountain)

Are you all aware of this? Please share any concerns or insights. Thank you. Ben

Please note all emails sent and received are subject to the Freedom of Information Act

Sent from my iPhone

Begin forwarded message:

From: "Hammond, Casey" [REDACTED]
Date: November 2, 2017 at 12:22:50 PM EDT
To: "Cassidy, Benjamin" [REDACTED]
Subject: East Lake closure (not eagle mountain)

Hey Ben,

Attached is the briefing paper on the closure I mentioned.

Thanks for your help.

Casey

Comments on Eastern Lake Mountains Target Shooting Plan Amendment

May 27, 2016

Bureau of Land Management
Salt Lake Field Office
3370 South Decker Lake Boulevard
West Valley City, Utah 84119

Dear Bureau of Land Management (BLM):

The Undersigned appreciate the opportunity to comment on the proposed target shooting plan amendment (plan amendment) to the Pony Express Resource Management Plan. These comments follow those that we submitted to the BLM in August 2015 during the scoping phase of the plan amendment and the discussions that took place earlier that year with the Salt Lake Field Manager.

As noted previously, our organizations have a long-standing and vested interest in access and opportunities on federal public lands for our members to enjoy hunting and recreational shooting. This vested interest led our organizations to sign the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) in 2006 with the BLM. The purpose of the MOU is to build a partnership “for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands.” The MOU was renewed in 2014 between four federal agencies and 43 hunting, fishing, wildlife conservation and shooting sports organizations.

The Eastern Lake Mountains plan amendment offers three management alternatives. Alternative A would allow the current 893-acre temporary closure to expire and implement no other target shooting restrictions. Alternative B would make the current closure permanent. Alternative C would extend the area of closure to encompass a total of 3,450 acres.

The environmental assessment (EA) states that 893-acre temporary closure was implemented to provide safety for adjacent landowners and to provide protection for Historic Properties, specifically petroglyphs. The EA states that the area is “not conducive to safe target shooting” because the topography is flat terrain with no natural backstops, the number of visitors continues to increase, a highway is present, and there are homeowners in the vicinity.

The EA addresses wildfires and notes that shooter-related wildfires have been reduced as a result of prohibitions or restrictions on the use of steel core and steel jacketed ammunition, the use of tracer or incendiary ammunition, and the possession or use of any kind of explosives, incendiary or chemical devices, pyrotechnics or fireworks, or exploding targets. In order to reduce trash left behind by shooters, there are restrictions on the type of targets allowed, “which are reasonably restricted to those that are specifically designed and sold for target shooting.”

Our organizations are fully aware that in order to balance the agency’s management responsibilities to protect natural and cultural resources and to provide for an array of recreational opportunities, closures may be appropriate. We believe that the EA has established sufficient justification to make the

temporary closure permanent, as proposed in Alternative B. What we do not agree with is Alternative C, the BLM's preferred alternative, which would extend the closure order to an additional 2,557 acres.

The Federal Register notice of 12/15/2014 that extended the temporary closure of the 893 acres for an additional two years noted that "Prior to the 2012 closure, the Lake Mountains received about 4,000 target shooters each month; and on weekends, as many as 400 shooters concentrated into 5 areas, and other dispersed locations." A BLM power point presentation noted that 20-50,000 target shooters recreate on these public lands every year. The EA clearly states that target shooting is "increasing dramatically" and that "the carrying capacity for any recreational activity is an analysis that would be addressed in a recreation area management plan." The narrow approach that the BLM has taken with this EA is perplexing in light of the statement above. The logical approach would have been to conduct such an analysis in the first place, and then develop a recreation area management plan based on the findings.

The objective of Alternative C is to "emphasize resource protection while maximizing public health and safety." That statement is in conflict with the justification for Alternative B, which states that the temporary closure was designed for public safety by moving shooters out of an area that by its topography was not safe for shooting. It implies that the concern for public health and safety was satisfied. Further addressing health and safety can only be justified through the development of a recreation area management plan, which the BLM intends not to do. Within that matrix, such a plan would evaluate the carrying capacity for recreational shooting (as noted in the above paragraph) in balance with other recreational needs, resource protection needs, the high demand for places to shoot and the degree to which the Soldier Pass Shooting Range could meet some of that demand.

With reference to the Soldier Pass Shooting Range, the BLM acknowledges that the range will not be able to fully accommodate the growing need for places to shoot and correctly cites this as a reason to keep public lands open. The logical approach, then, would be to wait until the agency and the County can evaluate the degree to which the shooting range is able to relieve the pressure for recreational shooting opportunities before contemplating closures beyond the exiting temporary closure of 893 acres. If Alternative C is adopted, we will never know if the combination of opening a county-operated shooting range and making the temporary closure order permanent (Alternative B) was adequate to address the public health and safety and resource protection issues that, according to the BLM, necessitated the process in the first place. The BLM can always evaluate the need for future closures at a later date based on far more accurate information and justification than is provided in Alternative C. The likelihood of BLM reopening areas that it would close under Alternative C if proved unnecessary is remote.

A recreation area management plan is what the BLM should be aiming for. Instead, the agency's response to shooting-related issues is to close more lands to shooting, which will likely increase and spread the problems by pushing displaced shooters into the areas that remain open. The same excuses could then be easily used down the road to close the entire planning area to recreational shooting after the Soldier Pass Shooting Range is up and running.

Notwithstanding the increasing recreational use pressure, the BLM's approach with this EA to keep it narrowly focused on public safety and resource protection is short sighted. It appears the BLM's intent is not to manage shooting but to take the easy route, which is incremental closures. Adding another 2,557 acres to the closure and talking about a recreation plan some point in the future is an easy administrative out.

A Salt Lake Tribune article dated April 7, 2016 entitled “BLM Transfers public Lands to Utah County, Parcel to be Used as a Shooting Range” in reference to the 160-acre transfer to public land to Utah County states that shooting related issues have “pushed state and federal land managers to close some lands to shooting and develop a plan to manage target shooting.” The writer was misinformed, as the plan amendment is not a plan to manage target shooting. Instead, it is a plan to close lands to shooting and transfer to Utah County the responsibility of providing opportunities for recreational shooting.

The BLM PowerPoint presentation under the heading *Public Safety Concerns* noted the need for safe shooting locations, but the EA dismisses identifying such locations as being outside the scope of the EA. The BLM’s preferred solution is to close an additional 2,557 acres rather than developing a recreation area management plan that could specifically identify those locations where recreational shooting would be a high safety risk. It should be noted that the EA says that “The public land user has the responsibility of locating safe and accessible areas in which to target shoot on BLM administered public lands.” That is not wise and acceptable management of a legitimate recreational activity on public lands.

Even the *Notice to Interested Party* dated July 2015 announcing the start of the planning process to amend the 1990 Pony Express Resource management Plan stated that the existing “RMP decisions related to management of recreational target shooting and resources affected by this activity are no longer adequate in this area” and that the BLM was seeking public input to help identify issues, impacts and alternatives that should be addressed in this amendment. The letter further stated that with the implementation of the temporary target shooting closure in 2012, “new and increased impacts and threats are now occurring in the areas into which the displaced target shooters have moved.”

In light of the obvious need for a recreation area management plan, the EA pointedly does not address any management decisions for recreational shooting other than expanded shooting closures. All other recommendations, such as identifying safe shooting areas, were dismissed as being outside the scope of the EA, which is narrowly focused on public safety and resource protection, and not target shooting management.

Under the rationale for supporting Alternative C, the EA states that “By displacing target shooting from the closure area into previously under-utilized portions of the Planning Area, the negative cumulative impacts associated with Alternative A may become apparent in those places.” There is likely not another statement in the entire EA that can advocate more forcefully for the development of a recreation area management plan instead of the piece meal closure approach that the BLM is taking in East Mountain Lakes. Why is such a narrow approach being taken in light of the broad management challenges that are described in the EA? Was this narrow approach a decision made by the Field Office or is it a result of direction at a higher level in the agency?

The management approach is a closure approach. First, the BLM closes nearly 900 acres for public safety and cultural resource protection. The EA notes that the closure “funnels displaced target shooters to specific, easily patrolled locations along the power line road west toward the Lake Mountains hillsides, which creates a de facto safety zone for law enforcement officers patrolling the area.” But the result was that the closure pushed the displaced shooters into areas where “many petroglyphs are located.” Thus the temporary closure did not meet the BLM’s objectives of protecting cultural resources.

Next, the EA states that problems associated with shooting like the use of inappropriate targets, micro trash and target shooting related wildfires have followed displaced shooters from the area under temporary closure into the area that is proposed for additional closure in Alternative C. So now under this EA, the plan is to follow the model of the temporary closure by extending the closure to additional areas, thus displacing shooters to other BLM public lands with the possibility of the same issues following displaced shooters. It is a scenario that suggests more public land closures down the road. What should have occurred from the beginning was the development of a recreation area management plan. The undersigned strongly support this approach and an end to the management by creeping closures.

During discussions with the Field Office Manager last year, we were told that the BLM worked with local interest groups to install a protective buck and pole fence along an existing powerline and that signs were installed to let shooters know of the presence of cultural resources in the area. The BLM indicated in an email to the MOU Roundtable Chair that the buck and pole fences with signs seeking voluntary compliance were used with great success. Yet, nothing in the EA speaks to the construction of the fence nor its effectiveness in protecting cultural resources, nor the work of private sector partners. Instead the EA justifies the adoption of BLM's preferred Alternative C by stating that the temporary closure is not effective because it channels shooters into other areas where there are petroglyphs. It cannot be both ways.

In the EA, the BLM noted the help of volunteers in cleaning up trash left behind by shooters, but also that left by people dumping their household refuse. The BLM notes that in spite of volunteer efforts, clean ups are still costly and use a lot of staff time. BLM asked about contacting local shooting groups to help keep the areas clean. We know that BLM has been in contact with the Utah Shooting Sports Council and would imagine that the Council is in an excellent position to directly partner with the BLM, or assist in locating local shooting enthusiasts who would welcome the opportunity to partner with the BLM in keep shooting sites clean. It is a far more positive and progressive approach than closing areas to recreational shooting.

With respect to law enforcement, the EA mentioned that after the temporary closure was put into effect, the Utah County Sheriff's Office and BLM law enforcement rangers began conducting regular patrols. It begs the question why the BLM-County partnership cannot be extended to the lands currently remaining open to recreational shooting. An area of just over 8,000 acres does not seem impossible to patrol. In fact, Alternative C indicates that patrols would take place in the additional areas proposed for closure, which would mean only 4,000 acres would remain. Certainly a law enforcement presence for all of the land within Eastern Lake Mountains would reduce problems associated with all recreational use and illegal dumping. There is no justification to use additional closures in order to achieve public safety and resource protection.

Lastly, with respect to spent lead ammunition, the EA says that the "potential long-term problem with shooting is the concentration of lead on public lands. Should it ever become necessary to remediate these areas, the cost of clean-up could be extensive. In the meantime, this contamination may present risks to the public and to wildlife." The EA provides no citations or evidence as to how spent lead ammunition could present a risk to the public and to wildlife in the planning area. It is an unscientific statement and appears to be designed to add as much negativity about recreational shooting as possible. If the BLM were to develop a recreational area management plan and identify

suitable, accessible areas of the public lands for recreational shooting, along with the support of shooters in conducting periodic clean up events, there is no reason to believe that the BLM would be facing some future remediation of these areas. We strongly recommend that the statement be removed.

In summary, the EA acknowledges the increasing popularity of recreational shooting and that the Soldier Pass Shooting Range is likely not to fully accommodate this popular sport, meaning that public land must remain open to this activity. Yet, the BLM has chosen to develop a closure plan under the narrow matrix of public safety and cultural resource protection, rather than have begun the development of a true and realistic management plan following the initial temporary closure of the 893 acres. The undersigned can support Alternative B, but are strongly opposed to the adoption of Alternative C.

Sincerely,

Congressional Sportsmen's Foundation

Council to Advance Hunting and the Shooting Sports

International Hunter Education Association - USA

Mule Deer Foundation

National Rifle Association

National Shooting Sports Foundation

Safari Club International

Wildlife Management Institute

From: [Campbell, Joshua](#)
To: [Recce, Susan](#)
Cc: [Cassidy, Benjamin](#); [Jorjani, Daniel](#)
Subject: Re: Comments on SDNM recreational shooting plan
Date: Friday, November 17, 2017 11:20:18 AM

Thanks, Susan! I will look into it and we can discuss after Thanksgiving.

On Fri, Nov 17, 2017 at 10:29 AM, Recce, Susan [REDACTED] > wrote:

Josh,

See exchange of emails. When I talked to Ben about this last month, I had the feeling that the Secretary's office was not going to pursue the concerns that the NRA and other NGOs raised in our comments (attached). We proposed modifying BLM's preferred planning alternative (Alternative C). BLM was under court order to get this shooting plan done by a certain date and, not surprising to me, the agency ran up to the deadline (supposedly the judge would not extend the timeframe) giving the Secretary's office no time to evaluate BLM's decision against the comments we submitted.

Susan

From: Recce, Susan
Sent: Thursday, October 05, 2017 5:51 PM
To: 'benjamin_cassidy@ios.doi.gov' <benjamin_cassidy@ios.doi.gov>
Subject: FW: Comments on SDNM recreational shooting plan

Hi Ben,

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Attached is the comment letter I sent in February. You will see in paragraph 2 that we want a modified Alternative C. Let me know if you have any questions on that. Also below is the BLM staffer we asked for those comments last month.

Best to you!!

Susan

From: Recce, Susan
Sent: Thursday, September 07, 2017 10:52 AM
To: 'cyounger@blm.gov' <cyounger@blm.gov>
Subject: Comments on SDNM recreational shooting plan

Hi Calle,

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Let me know if you have any questions.

Susan Recce

Director

Conservation, Wildlife and Natural Resources

Institute for Legislative Action

National Rifle Association